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FILED
HARRISBURG PA

OCT 03 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN D. PERKEY and	:	MARY E. D'ANDREA, CLE
THERESA M. PERKEY,	:	Per _____
Plaintiffs		Deputy Clerk
v.	:	
RELIABLE CARRIERS, INC.,	:	CIVIL ACTION NO. 1:CV-00-1639
DANIEL JOSEPH BEMBEN and	:	
KENT,	:	MAGISTRATE JUDGE SMYSER
Defendants		JURY TRIAL DEMANDED

**MOTION FOR LEAVE TO WITHDRAW AS
COUNSEL FOR DEFENDANTS**

1. The undersigned counsel, Edward E. Knauss, IV, had entered his appearance in this case. Attorney E. Ralph Godfrey had also entered his appearance in the case. Mr. Godfrey was an associate at the law firm of Metzger, Wickersham, Knauss & Erb, P.C.

2. Attorney Godfrey has left the law firm of Metzger, Wickersham, Knauss & Erb, P.C. and has established his own firm of Godfrey & Courtney, P.C.

3. At the request of the client, the file has been transferred in its entirety to Attorney Godfrey, who has been requested to assume the representation of the Defendants. Attorney Knauss is therefore no longer representing the Defendants in this matter, at the request of the client.

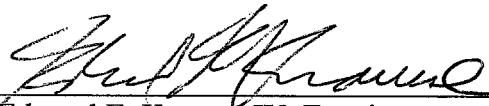
4. Attorney Knauss has been receiving copies of various orders and filings of the Court, and desires to no longer receive such documents, and to have his withdrawal from this case approved by the Court.

WHEREFORE, the undersigned counsel requests the Court to order that his appearance in the case is withdrawn.

Respectfully Submitted,

METZGER, WICKERSHAM, KNAUSS & ERB, P.C.

By _____


Edward E. Knauss, IV, Esquire
Attorney I.D. No. 19199
P.O. Box 5300
Harrisburg, PA 17110-0300
(717) 238-8187

Dated: October 1, 2002

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN D. PERKEY and :
THERESA M. PERKEY, :
Plaintiffs :
v. : CIVIL ACTION NO. 1:CV-00-1639
RELIABLE CARRIERS, INC., : MAGISTRATE JUDGE SMYSER
DANIEL JOSEPH BEMBEN and :
KENT, :
Defendants : JURY TRIAL DEMANDED

CERTIFICATE OF CONCURRENCE

I, Edward E. Knauss, IV, Esquire, hereby certify that I have contacted opposing counsel in this case, as well as Attorney Godfrey, and they concur with this Motion and agree that an Order may be issued by the Judge in accordance with the proposed Order submitted with the Motion.

METZGER, WICKERSHAM, KNAUSS & ERB, P.C.

By _____


Edward E. Knauss, IV, Esquire
Attorney I.D. No. 19199
P.O. Box 5300
Harrisburg, PA 17110-0300
(717) 238-8187

Dated: October 1, 2002

CERTIFICATE OF SERVICE

AND NOW, this 1st day of October, 2002, I, Edward E. Knauss, IV, Esquire, of Metzger, Wickersham, Knauss & Erb, P.C., hereby certify that I served a copy of the within Motion to Withdrawal this day by depositing the same in the United States mail, postage prepaid, at Harrisburg, Pennsylvania, addressed to:

Marcus A. McKnight, III, Esquire
Irwin, McKnight & Hughes
West Pomfret Professional Building
60 West Pomfret Street
Carlisle, PA 17013-3222

E. Ralph Godfrey, Esquire
Godfrey & Courtney, P.C.
P.O. Box 6280
Harrisburg, PA 17112



Edward E. Knauss, IV